

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program.

Rulemaking 06-05-027
(Filed May 25, 2006)

**TRANSMISSION RANKING COST REPORT OF
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E)
FOR RENEWABLE PORTFOLIO STANDARD PROCUREMENT**

AIMEE M. SMITH
101 Ash Street, HQ-12
San Diego, California 92101
Telephone: (619) 699-5042
Facsimile: (619) 699-5027
amsmith@sempra.com

Attorney for
SAN DIEGO GAS & ELECTRIC COMPANY

September 10, 2007

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In accordance with the *Amended Scoping Memo and Ruling of Assigned Commissioner Regarding 2008 RPS Procurement Plans*, issued June 15, 2007, as modified by ALJ Mattson's September 7, 2007 Ruling granting a one-day filing extension, San Diego Gas & Electric Company ("SDG&E") hereby submits its 2008 Transmission Ranking Cost Report, attached hereto as Exhibit A.

Respectfully submitted this 10th day of September, 2007.

/s/ Aimee M. Smith
AIMEE M. SMITH
101 Ash Street, HQ-12
San Diego, California 92101
Telephone: (619) 699-5042
Facsimile: (619) 699-5027
amsmith@sempra.com

Attorney for
SAN DIEGO GAS & ELECTRIC COMPANY

ATTACHMENT A

2008 TRANSMISSION RANKING COST REPORT

SDG&E

2008 Renewables Transmission Ranking Cost Report

San Diego Gas & Electric Company
8316 Century Park Court
San Diego, CA 92123-1582

Prepared by the SDG&E Transmission Planning Dept.

September 10, 2007



Table of Contents

Executive Summary	1
Introduction.....	6
Planning Horizon	8
Applicability of Study.....	8
Section 1 - Study Objective	10
Section 2 - Methodology, Criteria, and Assumptions.....	11
Study Methodology.....	11
Evaluation Criteria.....	11
Study Assumptions	11
Section 3 - Evaluation of Interconnection Alternatives.....	12
Cluster 1	12
Plan of Interconnection	12
Power Flow Results	12
Cluster 2.....	12
Plan of interconnection	13
Power Flow Results	13
Limitations	13
Cluster 3	14
Plan of Interconnection.....	14
Power Flow Results	14

Executive Summary

This Transmission Ranking Cost Report (TRCR), prepared at the direction of the California Public Utilities Commission (CPUC), provides transmission cost ranking information for providing transmission system improvements to integrate renewable energy projects into the San Diego Gas & Electric Company (SDG&E) transmission system that have provided bid solicitation information in compliance with the 2008 draft TRCR. Specifically, the bid solicitations are assumed to be bid into the 2008 Renewable Portfolio Standard (RPS) Procurement and interconnected by 2012. For purposes of this analysis transmission upgrade estimates were based on a 2012 powerflow analysis. All transmission upgrades included in SDG&E's Grid Assessment studies that have been approved by the CAISO are included in the 2012 analysis. This includes the addition of the 500 kV Sunrise Powerlink project. Without a new 500 kV transmission line out of the Imperial Valley the amount of new generation that would be allowed to interconnect is limited.

The methodology for identifying and estimating these conceptual transmission costs is provided by the CPUC in its Interim Opinion Adopting Methodology for Consideration of Transmission Costs in RPS Procurement (D.04-06-013) and restated with comments in the Interim Opinion Regarding Transmission Costs in RPS Procurement (D.05-07-040). In its Scoping Memo and Ruling of Assigned Commissioner (ACR) issued August 21, 2006, in R.06-05-027, as modified by the Administrative Law Judge's Ruling on Filing of Draft 2007 RPS Procurement Plans and Revised Schedule issued September 14, 2006, the CPUC directed SDG&E and the other Investor Owned Utilities (IOUs) to submit 2008 draft TRCRs to be used in Renewable Portfolio Standard (RPS) Procurement. (*See*, ACR, Attachment D).

In this TRCR, SDG&E provides estimated cost information regarding transmission upgrades needed for the RPS solicitations, based on studies of proposed renewable additions modeled according to the CPUC methodology.

The cost estimates in this report are conceptual and do not establish the ultimate cost of connecting a renewable resource to the grid. The reported cost estimates will be used solely to evaluate bids against each other and may not be representative of actual transmission upgrade costs. The estimates in this Report were not calculated for any other purpose and cannot be relied on for any other purpose. Additionally, the implied in-service dates for the transmission upgrades may not be achievable. Completion of identified transmission upgrades is dependent on many factors including permitting requirements and realistic construction schedules. Potential RPS bidders should use the information regarding transmission upgrades in developing bid responses to SDG&E's RPS procurement solicitations.

Renewable projects desiring more detailed transmission upgrade and associated cost information may participate in the CAISO interconnection process which will result in appropriate interconnection studies being performed.

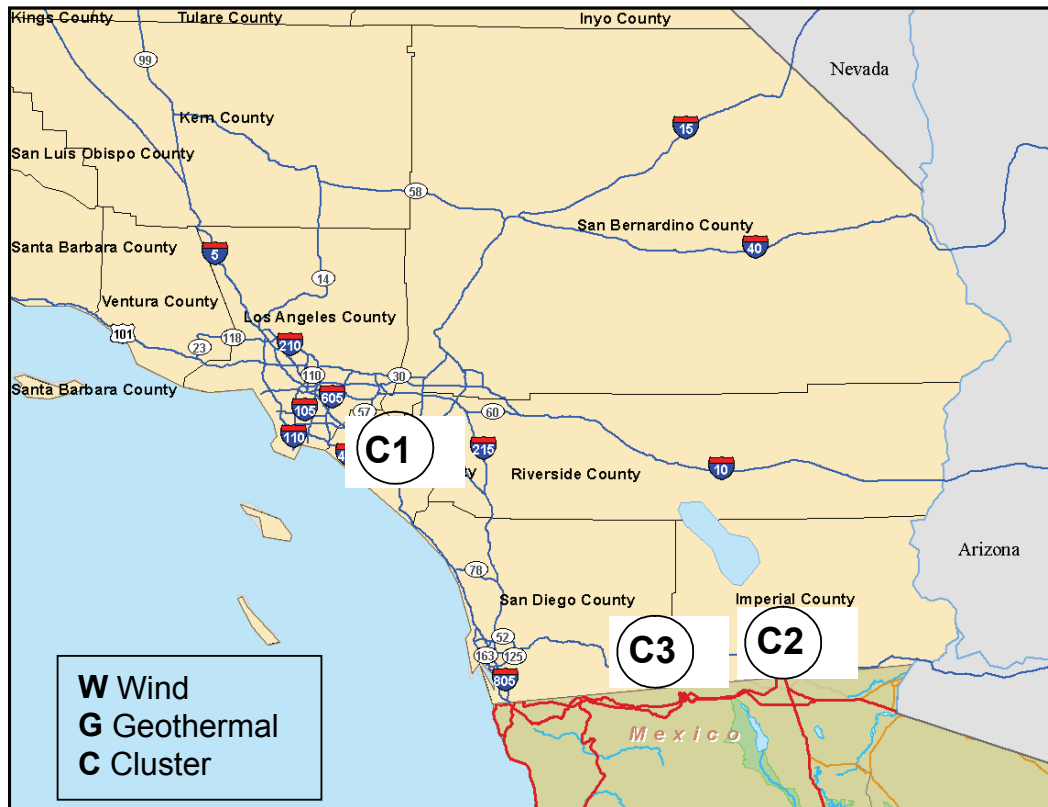
In August, 2007, SDG&E requested potential developers of renewable energy projects to provide information regarding projects that were being considered for delivery into and out of the SDG&E service territory. In response to that request, respondents submitted 29 projects for consideration. Four projects did not meet the minimum parameters for the study and were excluded from SDG&E's analysis. (Excluding respondents from this study does not prevent them from participating in the RPS process or seeking interconnection to the CAISO system.) The remaining 25 potential projects were organized into 3 geographic clusters as shown in Figure 1. External resources are modeled as if they are being delivered to specific SDG&E facilities within the SDG&E area. Clusters of projects have been determined and are assumed to interconnect to three corresponding cluster points, which were defined according to the individual respondent information and CPUC study methodology. Conceptual transmission studies were performed to determine the need for transmission system improvements (within the SDG&E system) to facilitate the interconnection of the prospective projects. This study does not evaluate transmission system improvements needed to deliver the output (of the renewable resources) to the SDG&E system from the areas external to SDG&E. There is no accounting of impacts on transmission systems other than SDG&E's.

The study assumed that energy from the renewable resource locations identified by cluster would be delivered at, but not necessarily connected to:

- **Cluster 1:** The 230 kV bus at San Onofre Nuclear Generating Station (SONGS).
- **Cluster 2:** The 230 kV bus at the Imperial Valley Substation
- **Cluster 3:** The 230 kV bus at a new 500/230 kV substation looped into the Imperial Valley-Miguel 500 kV tie line

The map below illustrates the approximate location of the renewable resources. The cluster points (C) indicate the approximate points of delivery.

Figure 1 - Overview of Potential Renewable Projects



The results of the transmission cost ranking study are shown in Table 1. The costs are in millions of dollars, and reflect the capital investment needed to upgrade the transmission system to accommodate delivery of the renewable output. Table 1 also contains an estimate of carrying costs reflecting CAISO transmission customer's Levelized Annual Capital Cost (LACC). The LACC is a uniform nominal-dollar cost stream whose present value is equal to that of the annual revenue requirements associated with the asset or assets. The LACC includes Book Depreciation, Return on Capital, Income Taxes, Property Taxes, and Salvage Effects associated with FERC-jurisdiction transmission accounts. The levels within each cluster in the table are defined later in this report (page 7) and are consistent with the renewable applicant responses.

This report does not attempt to quantify power plant production costs or impacts on congestion management costs.

Table 1 - Transmission Cost Ranking Summary¹

Cluster	Level	MW*	Upgrades	Cost (Million)	Carrying Charge** (Million)
C1	1	0 - 1752	n/a	n/a	
C2	1	0 - 500	Add 3rd 230/69 kV transformer at Sycamore Substation	\$16	\$2
			Expand 230 kV Bus at Imperial Valley to accommodate 2 gen-tie positions	\$13	\$1
	2	501 - 550	Add 3rd 500/230 kV transformer at Imperial Valley Substation	\$58	\$6
	3	551 - 1750	Add 3rd 500/230 kV transformer at Miguel Substation	\$71	\$8
			Expand 230 kV Bus at Imperial Valley to accommodate 2 gen-tie positions	\$17	\$2
	4	> 1750	Requires additional study. Power flow cases diverge	n/a	
C3	1	0 - 400	Construct a new 500/230 kV Substation by looping in the I.V. - ML 500 kV line. This scope includes one 230 kV Gen tie position (#1)	\$171	\$18
	2	400 - 1100	Add 3rd 230/69 kV transformer at Sycamore Substation	\$16	\$2
			Add 3rd 500/230 kV transformer at Miguel Substation	\$71	\$8
			Expand 230 kV Bus at the new substation to accommodate 2 gen-tie positions (#2 and #3)	\$11	\$1
	3	1100 - 1250	Add 2nd 500/230 kV transformer at the new substation. This scope includes one 230 kV Gen tie position (#4)	\$49	\$5
	4	> 1250	Requires additional study. Power flow cases diverge	n/a	

* Levels of MW include tripping Imperial Valley generation

** Carrying Charge assumed 10.74% estimated LACC

The cost estimates in Table 1 are to evaluate RPS bids one against each other and do not reflect the actual interconnection cost of connecting a renewable resource to the grid.

Cluster 1, 2 and 3 show stand alone costs based on studies including renewables only at cluster 1, 2 or 3 respectively.

Clusters 2 and 3 do have some common upgrades beyond the initial substation where the clusters were modeled. The specific upgrades that are common are a 3rd 500/230 kV transformer at Miguel Substation and a 3rd 230/69 kV transformer at Sycamore Canyon substation. Depending on the sequencing of generator additions at clusters 2 and 3, these two upgrades will be attributed to generators at one cluster or the other, not at both.

¹ The transmission model used in this analysis was a 2012 Heavy Summer scenario, which included SDG&E's expansion plans for 2007 to 2011. The model included one additional 500 kV transmission line (Sunrise Powerlink). All costs are based on conceptual estimates in year-of-expenditure dollars without AFUDC.

Introduction

This TRCR summarizes the results of a study to develop conceptual transmission costs for integration of new renewable resources into SDG&E's transmission grid, in order to fulfill SDG&E's RPS-related obligations.

Set forth below is an analysis of RPS-eligible renewable generation resources that are likely to be available by 2012 and could be acquired by solicitation in 2008 for projects outside SDG&E's service territory. SDG&E continues to use the Methodology for Development and Consideration of Transmission Costs in Initial Renewable Portfolio Standard Procurement (Interim Methodology) adopted in D.04-06-013. (See, D.04-06-013, *mimeo*, Attachment A).

SDG&E's TRCR reflects data regarding potential renewable energy bidders provided in response to SDG&E's solicitation, which was performed in accordance with the ACR (the "Solicitation"). (See, ACR, Attachment D).

SDG&E includes in its Transmission Ranking Cost Report conceptual transmission cost estimates for the following types of potential renewable energy bidders, which are assumed to be dispatched as if delivered into the SDG&E service territory:

- **SDG&E Internal** Renewable energy resources for which the first point of interconnection with the transmission grid is, or will be, at a facility inside SDG&E service area and whose output is expected to be sold to SDG&E.
- **SDG&E Export** Renewable energy resources for which the first point of interconnection with the transmission grid is, or will be, at a facility owned by SDG&E and whose output is expected to be sold to a different entity.
- **SDG&E External** Renewable energy resources located outside of the SDG&E service area, for which the project developer has indicated that it anticipates submitting an RPS bid to SDG&E.

This approach allows for the determination of the system upgrades and is not intended to determine or constrict the business plan of the various respondents.

In this study all respondents are in the SDG&E External category.

Table 2 summarizes the capacity and type of renewable energy proposals considered in the Transmission Ranking Cost Report.

Table 2 - SDG&E Renewable Energy Capacity (MW) Considered in the TRCR

Renewable Resource	SDG&E Internal MW	SDG&E External MW	Total MW
Wind	0	2989	2989
Geothermal	0	175	175
Solar	0	3757.8	3757.8

Based upon review of a geographical map, SDG&E divided the identified potential renewable energy bidders into clusters, based on the grid locations to which the identified renewable resources would most likely interconnect. If the renewable resource's first point of interconnection is at a substation or bus not owned by SDG&E, that renewable resource will be treated as part or all of a cluster, beginning at the first point where such added generation would first enter SDG&E's transmission system. Table 3 shows the details of the clusters and proposed in-service dates.

Table 3 - Renewable Energy Cluster Details (MW)

Cluster	Total MW 2012
C1 (external)	1,752 MW
C2 (external)	3,649.8 MW
C3 (external)	1,520 MW

To identify the transmission upgrades, SDG&E conducted specific thermal studies modeling the projects as described above. To the extent they were available, pre-existing studies were considered in this analysis. Based on the results, conceptual transmission cost estimates for delivery of the full output of the renewable projects were prepared.

The transmission upgrade capacities and estimated transmission costs were allocated as follows:

- Level 1 – the transmission capacity is expected to be available, which may include upgrades identified for projects in the CAISO Controlled Grid Generation Queue with completed Interconnection Studies which were included in the base case in the utility's conceptual transmission studies.
- Levels 2-4 – the transmission capacity is expected to become available with the lowest cost (or most cost-effective) network upgrade, in addition to upgrades included in Level 1. An additional level shall be created for each next-most cost-effective network upgrade, with the number of levels depending on the number of network upgrades needed to accommodate the total amount of feasible generation in the identified cluster.

Planning Horizon

The responses to SDG&E's Solicitation varied by resource capacity, type of renewable resources, and location. Within each cluster, the conceptual transmission plan of service was developed to serve all of the capacity within a given cluster and within a timeframe established by the proposed in-service dates of the projects. All power flow studies were conducted using a 2012 Heavy Summer power flow case and included the Sunrise Powerlink. Without a new 500 kV transmission line out of the Imperial Valley the amount of new generation that would be allowed to interconnect is limited.

Applicability of Study

This TRCR is based upon the responses to SDG&E's Solicitation. The objectives of the study are to

- (1) Investigate the impacts of injecting energy from renewable resources into the SDG&E system at various locations
- (2) Identify possible transmission upgrades/expansion necessary to integrate the resources
- (3) Provide conceptual cost estimates associated with the transmission upgrades/expansion
- (4) Address and discuss other issues associated with construction of the new facilities that may ultimately impact the transmission plan of service and cost

These screening level evaluations do not constitute Interconnection Studies under the CAISO Tariff² on file with the Federal Energy Regulatory Commission, as modified or superseded from time to time. Any developer seeking interconnection to the CAISO controlled grid will have to submit an Interconnection Request to the CAISO. This requirement includes any developer whose RPS bid is accepted, based on the transmission cost estimates developed through this process that later seeks interconnection, or seeks to increase its generating capacity to make its RPS deliveries. Interconnection Studies required by the CAISO Tariff must be conducted based on the then-existing CAISO Controlled Grid Generation Queue. The final interconnection facilities, costs, and construction schedule for any developer resulting from an Interconnection Request to the CAISO may differ significantly from the transmission facilities, cost estimates, and implied construction schedule developed through this solicitation. Therefore, the conceptual cost estimates developed in this TRCR should not be relied upon to establish the actual cost of interconnecting to the grid.

2 In an order issued on July 1, 2005 ("July 1 Order"), the Federal Energy Regulatory Commission ("FERC") approved in part, and rejected in part, the California Independent System Operator's ("CAISO") Order Nos. 2003, 2003-A, and 2003-B Large Generator Interconnection Procedure ("LGIP") compliance filings. FERC ruled that these interconnection compliance filings were effective upon issuance of its order on July 1, 2005. Subsequently, in compliance with the July 1 Order, the California Independent System Operator Corporation ("ISO") submitted on November 1, 2005 its long-term Standard Large Generator Interconnection Procedures ("LGIP"), incorporating a new centralized Interconnection Study process for Large Generating Facility interconnections to the ISO Controlled Grid, for Commission approval and inclusion in the ISO Tariff. On May 24, 2006, FERC issued an order "Accepting in part and Rejecting with Modifications" the LGIP compliance filings, and on June 23, 2006, the CAISO filed conforming LGIP revisions which received FERC approval and inclusion in the CASIO tariff.

The assessment covers transmission Network Upgrades designed to deliver energy from the first point of interconnection of the renewable resources to SDG&E's transmission system. Interconnection Facilities³ or gen-ties are not covered, but where deemed necessary, facility costs are estimated to integrate the renewable project(s) with the presumed point of interconnection. Transmission cost estimates are based on proxy facilities that could mitigate the identified potential overloads due to the addition of renewable resources.

The study assumed that energy from the renewable resource locations identified by cluster would be delivered at, but not necessarily connected to :

- **Cluster 1:** The 230 kV bus at San Onofre Nuclear Generating Station (SONGS).
- **Cluster 2:** The 230 kV bus at the Imperial Valley Substation
- **Cluster 3:** The 230 kV bus at a new 500/230 kV substation looped into the Imperial Valley-Miguel 500 kV tie line

This study assumes that each renewable resource connected in response to SDG&E's renewable solicitation would operate in accordance with existing and anticipated system operating limits, such as the Miguel Import Nomogram and existing and anticipated SDG&E import capabilities.

³ Interconnection Facilities are transmission facilities necessary to physically and electrically interconnect a new generating facility to the CAISO controlled grid.

Section 1 - Study Objective

Study Objective

The study focuses on identifying the magnitude of potential transmission upgrades and costs and, as appropriate, identifying critical issues that might affect the development of those facilities. It is recognized that the scope and cost estimates of potential new transmission facilities or upgrades can only be as detailed as the resource development information collected, and will be further dependent upon the order and timing of actual interconnections sought by developers of renewable energy projects.

The study delineates a set of system upgrades related to renewable resource development with various in-service dates, studied to be in-service by 2012, based on the geographic location and magnitude of resource development provided by renewable developers during SDG&E's Solicitation. This is a conceptual level study and the results should only be used for ranking purposes during the renewable bid solicitation.

Section 2 - Methodology, Criteria, and Assumptions

Study Methodology

This screening level study examines the impacts on the SDG&E transmission network from potential renewable generation identified through SDG&E's Solicitation in September, 2007. These studies are cursory in nature and are intended only to identify the coarse effects of adding new generation to the system.

Power flow analysis was performed on a heavy summer 2012 case for each cluster. The 25 projects included in the study assumed that the projects would start deliveries by or before summer 2012.

Cluster 1, 2 and 3 analyze stand alone upgrades based on studies including renewables only at cluster 1, 2 or 3 respectively.

Clusters 2 and 3 do have some common upgrades beyond the initial substation where the clusters were modeled. The specific upgrades that are common are a 3rd 500/230 kV transformer at Miguel Substation and a 3rd 230/69 kV transformer at Sycamore Canyon substation. Depending on the sequencing of generator additions at clusters 2 and 3, these two upgrades will be attributed to generators at one cluster or the other, not at both.

Evaluation Criteria

The following evaluation criteria were used for the power flow analysis:

- During normal operation (all facilities in service), line and transformer loading should not exceed the specified continuous (normal) rating.
- During contingency operation (single element out of service), in the SDG&E service territory, line and transformer loading should not exceed the specified emergency rating.
- Only the SDG&E transmission system was screened for thermal overloads.

Study Assumptions

- A 90/10 load forecast was used for SDG&E's service territory.
- GE PSLF version 15 was used to perform the power flow analysis.
- A grid planning power flow case from the 2007 Grid Assessment and Expansion Study was utilized.
 - The transmission model used includes SDG&E's expansion plans for 2007 to 2011. These include one additional 500 kV transmission line (Sunrise Powerlink). Without a new 500 kV transmission line out of the Imperial Valley the amount of new generation that would be allowed to interconnect is limited.

- All SDG&E generation and projects approved in the CAISO 2006 Grid assessment study for SDG&E were modeled, but not necessarily dispatched in the cases.
- The SDG&E import level is approximately 4000 MW in the 2012 heavy summer cases.

Section 3 - Evaluation of Interconnection Alternatives

The Interconnection Facilities costs are not included in this study. The study assumes that these costs are to be paid by the generation developer.

Based on geographic location and interconnection point, the renewable energy resources were divided into 3 clusters. All clusters are external to the SDG&E transmission system.

Cluster 1

Total Cluster Size: 1,752 MW

Cluster 1 represents 9 projects, including wind, geothermal and solar generation, totaling 1,752 MW. All projects are external to and located north of SDG&E's service territory. All Cluster 1 projects are proposed to be in service by 2012.

Plan of Interconnection

Cluster 1 generation was modeled as an import at the jointly owned San Onofre 230 kV Substation, which is the first point of interconnection to SDG&E's transmission system.

Power Flow Results

The addition of 1752 MW in Cluster 1 in 2012 does not cause any facility overloads in SDG&E's transmission system. Therefore, no facility upgrades are required.

Limitations

Cluster 1 study shows no limitations in SDG&E due to the cluster 1 generation.

Cluster 2

Total Cluster Size: 3,649.8 MW

Cluster 2 represents 12 projects, including wind, geothermal and solar generation, totaling 3,649.8 MW. All projects are external to SDG&E's service territory and connect to the Imperial Valley Substation. All Cluster 2 projects are proposed to be in service by 2012.

Plan of interconnection

Cluster 2 generation was modeled at the Imperial Valley 230 kV Substation. It was assumed that this generation would not displace existing generation within SDG&E's transmission system and SDG&E's import level would not be changed. However import flows would shift, with less import south from SCE and higher import from the east to SDG&E.

Power Flow Results

The addition of 1,700 MW in 2012 caused three new facility overloads requiring an upgrade at the Imperial Valley, Miguel and Sycamore Substations. The estimated cost of the upgrades is \$176 million with an estimated \$19 million of LACC.

Upgrades include:

1. Third Miguel 500/230 kV transformer
2. Third Imperial Valley 500/230 kV transformer
3. Third Sycamore 230/69 kV transformer

Limitations

There is an existing Special Protection Scheme (SPS) that trips existing generation for the loss of the Imperial Valley – Miguel 500 kV line. The proposed generation in Cluster 2 may be required to participate in the generation reduction portion of the SPS.

These results assume the addition of the 500 kV Sunrise Powerlink project. Without a new 500 kV transmission line out of the Imperial Valley the amount of new generation that would be allowed to interconnect will be limited due to the CAISO SPS limit of 1150 MW of generation tripping for a single contingency. There is currently 1070 MW of generation that is subject to tripping for the outage of the Imperial Valley to Miguel 500 kV line.

The power flow case diverged with more than 1,700 MW dispatched Imperial Valley. System instability may be a result of the lack of voltage support. Voltage studies are outside of the scope of this study.

Cluster 3

Total Cluster Size: 1,520 MW

Cluster 3 represents 4 projects, including wind, geothermal and solar generation, totaling 1,520 MW. All projects are external to SDG&E's service territory and connect to the new substation looped into the Imperial Valley-Miguel 500 kV tie line. All Cluster 3 projects are proposed to be in service by 2012.

Plan of interconnection

Cluster 3 generation was modeled at the new substation looped into the Imperial Valley-Miguel 500 kV tie line. The substation was assumed to be a 500/230 kV substation with generation connecting to the 230 kV bus. It was assumed that this generation would not displace existing generation within SDG&E's transmission system and SDG&E's import level would not be changed. However import flows would shift, with less import south from SCE and higher import from the east to SDG&E.

Power Flow Results

The addition of 1,250 MW in 2012 caused three new facility overloads requiring an upgrade at the Imperial Valley, Miguel and Sycamore Substations. The estimated cost of the upgrades is \$319 million with an estimated \$34 million of LACC.

Upgrades include:

1. New 500/230 kV Substation
2. Third Miguel 500/230 kV transformer
3. Second 500/230 kV transformer at the new substation
4. Third Sycamore 230/69 kV transformer

Limitations

There is an existing Special Protection Scheme (SPS) that trips existing generation for the loss of the Imperial Valley – Miguel 500 kV line. The proposed generation in Cluster 3 may be required to participate in the generation reduction portion of the SPS.

These results assume the addition of the 500 kV Sunrise Powerlink project. Without a new 500 kV transmission line out of the Imperial Valley the amount of new generation that would be allowed to interconnect will be limited due to the CAISO SPS limit of 1150 MW of generation tripping for a single contingency. There is currently 1070 MW of generation that is subject to tripping for the outage of the Imperial Valley to Miguel 500 kV line.

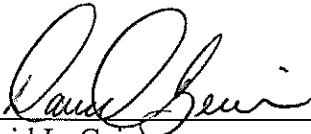
The power flow case diverged with more than 1,250 MW dispatched at the new substation. System instability may be a result of the lack of voltage support. Voltage studies are outside of the scope of this study.

VERIFICATION

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. The matters stated in the foregoing 2008 TRANSMISSION RANKING COST REPORT are true to my own knowledge, except as to matters which are stated therein on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 10th day of September, 2007, at San Diego, California



David L. Geier
Vice President, Electric Transmission & Distribution

CERTIFICATE OF SERVICE

I hereby certify that a copy of **TRANSMISSION RANKING COST REPORT OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) FOR RENEWABLE PORTFOLIO STANDARD PROCUREMENT** has been electronically mailed to each party of record on the service list in R.06-05-027. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Commissioner Michael R. Peevey and the Assigned Administrative Law Judges Burton Mattson and Anne E. Simon.

Executed this 10th day of September 2007 at San Diego, California

/s/ Jodi Ostrander
Jodi Ostrander

CALIFORNIA PUBLIC UTILITIES COMMISSION

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Parties

ENERGY AMERICA, LLC
ONE STAMFORD PLAZA, 8TH FLOOR
263 TRESSER BLVD.
STAMFORD, CT 06901

DANIEL V. GULINO
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVENUE
RIDGEWOOD, NJ 07450

RICK C. NOGER
PRAXAIR PLAINFIELD, INC.
2711 CENTERVILLE ROAD, SUITE 400
WILMINGTON, DE 19808

KEITH MC CREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004-2415

CAROL A. SMOOTS
PERKINS COIE LLP
607 FOURTEENTH STREET, NW, SUITE 800
WASHINGTON, DC 20005

RHONE RESCH
SOLAR ENERGY INDUSTRIES ASSOCIATION
805 FIFTEENTH STREET, N.W., SUITE 510
WASHINGTON, DC 20005

GARSON KNAPP
FPL ENERGY, LLC
770 UNIVERSE BLVD.
JUNO BEACH, FL 33408

KEVIN BOUDREAUX
MANAGER-RETAIL OPERATIONS
CALPINE POWERAMERICA CA, LLC
717 TEXAS AVENUE, SUITE 1000
HOUSTON, TX 77002

ELIZABETH WRIGHT
OCCIDENTAL POWER SERVICES, INC.
5 GREENWAY PLAZA, SUITE 110

STACY AGUAYO
APS ENERGY SERVICES COMPANY, INC.
400 E. VAN BUREN STREET, STE 750

HOUSTON, TX 77046

PHOENIX, AZ 85004

ROBERT NICHOLS
NEW WEST ENERGY
MAILING STATION ISB 665
BOX 61868
PHOENIX, AZ 85082-1868

DAVID SAUL
COO
SOLEL, INC.
701 NORTH GREEN VALLEY PKY, STE 200
HENDERSON, NV 89074

RASHA PRINCE
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST 5TH STREET, GT14D6
LOS ANGELES, CA 90013

DAVID L. HUARD
ATTORNEY AT LAW
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CA 90064

RANDALL W. KEEN
ATTORNEY AT LAW
MANATT PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES, CA 90064

NORMAN A. PEDERSEN
HANNA AND MORTON LLP
444 S FLOWER ST., SUITE 1500
LOS ANGELES, CA 90071-2916

3 PHASES ENERGY SERVICES
2100 SEPULVEDA BLVD., SUITE 37
MANHATTAN BEACH, CA 90266

MICHAEL MAZUR
CHIEF TECHNICAL OFFICER
3 PHASES RENEWABLES, LLC
2100 SEPULVEDA BLVD., SUITE 37
MANHATTAN BEACH, CA 90266

SUSAN MUNVES
ENERGY AND GREEN BLDG. PROG. ADMIN.
CITY OF SANTA MONICA
1212 5TH STREET, FIRST FLOOR
SANTA MONICA, CA 90401

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367

GREGORY S. G. KLATT
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367-8102

PAUL DELANEY
AMERICAN UTILITY NETWORK (A.U.N.)
10705 DEER CANYON DRIVE
ALTA LOMA, CA 91737

CATHY A. KARLSTAD
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

MICHAEL D. MONTOYA
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

WILLIAM V. WALSH
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

SOCAL WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773

RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BOULEVARD
SAN DIMAS, CA 91773

ANN MOORE
CITY OF CHULA VISTA
276 FOURTH AVENUE
CHULA VISTA, CA 91910

MICHAEL MEACHAM
ENVIRONMENTAL RESOURCE MANAGER
CITY OF CHULA VISTA
276 FOURTH AVENUE
CHULA VISTA, CA 91910

STRATEGIC ENERGY, LTD.
7220 AVENIDA ENCINAS, SUITE 120
CARLSBAD, CA 92009

AIMEE M. SMITH
ATTORNEY AT LAW
SEMPRA ENERGY
101 ASH STREET HQ13
SAN DIEGO, CA 92101

FREDERICK M. ORTLIEB
OFFICE OF CITY ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVENUE, SUITE 1100
SAN DIEGO, CA 92101

SEMPRA ENERGY SOLUTIONS
101 ASH STREET, HQ09
SAN DIEGO, CA 92101-3017

GREG BASS
SEMPRA ENERGY SOLUTIONS
101 ASH STREET. HQ09
SAN DIEGO, CA 92101-3017

SYMONE VONGDEUANE
SEMPRA ENERGY SOLUTIONS
101 ASH STREET, HQ09
SAN DIEGO, CA 92101-3017

THEODORE E. ROBERTS
ATTORNEY AT LAW
SEMPRA ENERGY
101 ASH STREET, HQ 12B
SAN DIEGO, CA 92101-3017

DONALD C. LIDDELL
ATTORNEY AT LAW
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103

MARCIE MILNER
CORAL POWER, L.L.C.
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA 92121

REID WINTHROP
PILOT POWER GROUP, INC.
8910 UNIVERSITY CENTER LANE, SUITE 520

THOMAS R. DARTON
PILOT POWER SERVICES, INC.
SUITE 112

SAN DIEGO, CA 92122

9320 CHESAPEAKE DRIVE
SAN DIEGO, CA 92123

GLORIA BRITTON
ANZA ELECTRIC COOPERATIVE, INC.
58470 HWY 371
PO BOX 391909
ANZA, CA 92539

LYNELLE LUND
COMMERCE ENERGY, INC.
600 ANTON BLVD., SUITE 2000
COSTA MESA, CA 92626

ROB GUNNIN
VICE PRESIDENT SUPPLY
COMMERCE ENERGY, INC.
600 ANTON BLVD., SUITE 2000
COSTA MESA, CA 92626

WILL PLAXICO
HELIOS ENERGY, LLC
31897 DEL OBISPO ST. SUITE 220
SAN JUAN CAPISTRANO, CA 92675

AOL UTILITY CORP.
12752 BARRETT LANE
SANTA ANA, CA 92705

KERRY EDEN
DEPARTMENT OF WATER
CITY OF CORONA DEPT. OF WATER & POWER
730 CORPORATION YARD WAY
CORONA, CA 92880

PHILLIP REESE
INC.
C/O REESE-CHAMBERS SYSTEMS CONSULTANTS,
PO BOX 8
3379 SOMIS ROAD
SOMIS, CA 93066

TAMLYN M. HUNT
ENERGY PROGRAM DIRECTOR
COMMUNITY ENVIRONMENTAL COUNCIL
26 W. ANAPAMU ST., 2/F
SANTA BARBARA, CA 93101

JOSEPH LANGENBERG
CENTRAL CALIFORNIA POWER
949 EAST ANNADALE AVE., A210
FRESNO, CA 93706

DAVID ORTH
KINGS RIVER CONSERVATION DISTRICT
4886 EAST JENSEN AVENUE
FRESNO, CA 93725

JANE H. TURNBULL
LEAGUE OF WOMEN VOTERS OF CALIFORNIA
64 LOS ALTOS SQUARE
LOS ALTOS, CA 94022

JANIS C. PEPPER
CLEAN POWER MARKETS, INC.
PO BOX 3206
LOS ALTOS, CA 94024

BRUCE FOSTER
VICE PRESIDENT
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVENUE, STE. 2040
SAN FRANCISCO, CA 94102

MARCEL HAWIGER
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

STEPHEN A.S. MORRISON
ATTORNEY AT LAW
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM 234
SAN FRANCISCO, CA 94102

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104

ROD AOKI
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104

ARTHUR HAUBENSTOCK
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

CHARLES MIDDLEKAUFF
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105

CRAIG M. BUCHSBAUM
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

EDWARD V. KURZ
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
77 BEALE ST., MAIL CODE B30A
SAN FRANCISCO, CA 94105

EVELYN C. LEE
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL DROP 30A
SAN FRANCISCO, CA 94105

JEANNE MCKINNEY
THELEN REID BROWN RAYSMAN & STEINER
101 SECOND STREET, SUITE 1800
SAN FRANCISCO, CA 94105

WILLIAM H. CHEN
CONSTELLATION NEW ENERGY, INC.
SPEAR TOWER, 36TH FLOOR
ONE MARKET STREET
SAN FRANCISCO, CA 94105

JP ROSS
DEPUTY DIRECTOR
THE VOTE SOLAR INITIATIVE
300 BRANNAN STREET, SUITE 609
SAN FRANCISCO, CA 94107

BRIAN CRAGG
ATTORNEY AT LAW
GOODIN, MAC BRIDE, SQUERI, RITCHIE & DAY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

JAMES D. SQUERI
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

JOSEPH M. KARP
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET
SAN FRANCISCO, CA 94111-5802

JEFFREY P. GRAY
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP

SARA STECK MYERS
LAW OFFICES OF SARA STECK MYERS
122 28TH AVE.

505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

SAN FRANCISCO, CA 94121

ARNO HARRIS
RECURRENT ENERGY, INC.
220 HALLECK ST., SUITE 220
SAN FRANCISCO, CA 94129

GABE PETLIN
3DEGREES
PRESIDIO OF SAN FRANCISCO
6 FUNSTON AVENUE
SAN FRANCISCO, CA 94129

JANICE G. HAMRIN
CENTER FOR RESOURCE SOLUTIONS
PRESIDIO BUILDING 97
PO BOX 29512
SAN FRANCISCO, CA 94129

JENNIFER CHAMBERLIN
STRATEGIC ENERGY, LLC
2633 WELLINGTON CT.
CLYDE, CA 94520

JOHN DUTCHER
VICE PRESIDENT - REGULATORY AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD, CA 94534-7875

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICE OF WILLIAM H. BOOTH
1500 NEWELL AVE., 5TH FLOOR
WALNUT CREEK, CA 94556

AVIS KOWALEWSKI
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588

LINDA Y. SHERIF
ATTORNEY AT LAW
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588

JODY LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND, CA 94609

ERIC LARSEN
ENVIRONMENTAL SCIENTIST
RCM INTERNATIONAL
PO BOX 4716
BERKELEY, CA 94704

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704

NEAL DE SNOO
CITY OF BERKELEY
2180 MILVIA STREET, 2ND FLOOR
BERKELEY, CA 94704

CLYDE MURLEY
1031 ORDWAY STREET
ALBANY, CA 94706

NANCY RADER
CALIFORNIA WIND ENERGY ASSOCIATION
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710

R. THOMAS BEACH
PRINCIPAL CONSULTANT
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710-2557

L. JAN REID
COAST ECONOMIC CONSULTING
3185 GROSS ROAD
SANTA CRUZ, CA 95062

MEGAN MACNEIL MYERS
ATTORNEY AT LAW
LAW OFFICES OF MEGAN MACNEIL MYERS
PO BOX 638
LAKEPORT, CA 95453

JOHN R. REDDING
ARCTURUS ENERGY CONSULTING
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460

JAMES WEIL
DIRECTOR
AGLET CONSUMER ALLIANCE
PO BOX 37
COOL, CA 95614

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON, CA 95620-4208

JUDITH SANDERS
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

ANDY WUELLNER
MOUNTAIN UTILITIES
PO BOX 1
KIRKWOOD, CA 95646

KIRBY DUSEL
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670

JOHN DALESSI
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814

DAN GEIS
THE DOLPHIN GROUP
925 L STREET, SUITE 800
SACRAMENTO, CA 95814

DAN L. CARROLL
ATTORNEY AT LAW
DOWNEY BRAND, LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814

DAVID A. BISCHER
PRESIDENT
CALIFORNIA FORESTRY ASSOCIATION
1215 K STREET, SUITE 1830
SACRAMENTO, CA 95814

JAN MCFARLAND
AMERICANS FOR SOLAR POWER
1100 11TH STREET, SUITE 323

JOHN B. HOFMANN
REGIONAL COUNCIL OF RURAL COUNTIES
801 12TH STREET, SUITE 600

SACRAMENTO, CA 95814

SACRAMENTO, CA 95814

WILLIAM W. WESTERFIELD III
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95814

LYNN M. HAUG
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814-3512

KAREN NORENE MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833

JESSICA NELSON
PLUMAS-SIERRA RURAL ELECTRIC CO-OP
73233 STATE ROUTE 70, STE A
PORTOLA, CA 96122-7064

RYAN FLYNN
PACIFICORP
825 NE MULTNOMAH STREET, 18TH FLOOR
PORTLAND, OR 97232

KAREN MCDONALD
POWEREX CORPORATION
1400,
666 BURRAND STREET
VANCOUVER, BC V6C 2X8
CANADA

Information Only

WILLIAM P. SHORT
RIDGEWOOD POWER MANAGEMENT, LLC
947 LINWOOD AVENUE
RIDGEWOOD, NJ 07450

STEVEN S. SCHLEIMER
DIRECTOR, COMPLIANCE & REGULATORY AFFAIRS
BARCLAYS BANK, PLC
200 PARK AVENUE, FIFTH FLOOR
NEW YORK, NY 10166

CHRISTOPHER O'BRIEN
SHARP SOLAR
VP STRATEGY AND GOVERNMENT RELATIONS
3808 ALTON PLACE NW
WASHINGTON, DC 20016

VENKAT SURAVARAPU
ASSOCIATES DIRECTOR
CAMBRIDGE ENERGY RESEARCH ASSOCIATES
1150 CONNECTICUT AVENUE NW, STE. 201
WASHINGTON, DC 20036

KEVIN PORTER
EXETER ASSOCIATES, INC.
SUITE 310
5565 STERRETT PLACE
COLUMBIA, MD 21044

TODD JAFFE
ENERGY BUSINESS BROKERS AND CONSULTANTS
3420 KEYSER ROAD
BALTIMORE, MD 21208

RALPH E. DENNIS
DIRECTOR, REGULATORY AFFAIRS
FELLON-MCCORD & ASSOCIATES

CATHY S. WOOLLUMS
MIDAMERICAN ENERGY HOLDINGS COMPANY
106 EAST SECOND STREET

CONSTELLATION NEWENERGY-GAS DIVISION
9960 CORPORATE CAMPUS DRIVE, STE 2000
LOUISVILLE, KY 40223

DAVENPORT, IA 52801

MARY COLLINS
POLICY ADVISOR TO COMMISSIONER LIEBERMAN
ILLINOIS COMMERCE COMMISSION
160 NORTH LASALLE STREET, STE. C-800
CHICAGO, IL 60601

JASON ABIECUNAS
BLACK & BEATCH GLOBAL RENEWABLE ENERGY
RENEWABLE ENERGY CONSULTANT
11401 LAMAR
OVERLAND PARK, KS 66211

RYAN PLETKA
RENEWABLE ENERGY PROJECT MANAGER
BLACK & VEATCH
11401 LAMAR
OVERLAND PARK, KS 66211

ANN HENDRICKSON
COMMERCE ENERGY, INC.
222 WEST LAS COLINAS BLVD., SUITE 950E
IRVING, TX 75039

TRENT A. CARLSON
RELIANT ENERGY
1000 MAIN STREET
HOUSTON, TX 77001

ED CHIANG
ELEMENT MARKETS, LLC
ONE SUGAR CREEK CENTER BLVD., SUITE 250
SUGAR LAND, TX 77478

JONATHAN JACOBS
PA CONSULTING GROUP
390 INTERLOCKEN CRESCENT, SUITE 410
BROOMFIELD, CO 80021

ELIZABETH BAKER
SUMMIT BLUE CONSULTING
1722 14TH STREET, SUITE 230
BOULDER, CO 80304

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVENUE
DURANGO, CO 81301

JENINE SCHENK
APS ENERGY SERVICES
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85004

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO, NV 89520

TREVOR DILLARD
SIERRA PACIFIC POWER COMPANY
PO BOX 10100
6100 NEIL ROAD, MS S4A50
RENO, NV 89520

JOE GRECO
CAITHNESS OPERATING COMPANY
9590 PROTOTYPE COURT, SUITE 200
RENO, NV 89521

HUGH YAO
SOUTHERN CALIFORNIA GAS COMPANY
555 W. 5TH ST, GT22G2
LOS ANGELES, CA 90013

HARVEY EDER
PUBLIC SOLAR POWER COALITION
1218 12TH ST., 25
SANTA MONICA, CA 90401

STEVE CHADIMA
ENERGY INNOVATIONS, INC.
130 WEST UNION STREET
PASADENA, CA 91103

TOM HAMILTON
MANAGING PARTNER
ENERGY CONCIERGE SERVICES
321 MESA LILA RD
GLENDALE, CA 91208

JACK MCNAMARA
ATTORNEY AT LAW
MACK ENERGY COMPANY
PO BOX 1380
AGOURA HILLS, CA 91376-1380

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

FRANK W. HARRIS
REGULATORY ECONOMIST
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE
ROSEMEAD, CA 91770

GARY L. ALLEN
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JAMES B. WOODRUFF
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, SUITE 342, GO1
ROSEMEAD, CA 91770

LIZBETH MCDANNEL
2244 WALNUT GROVE AVE., QUAD 4D
ROSEMEAD, CA 91770

KEITH SWITZER
GOLDEN STATE WATER COMPANY
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773-9016

ABBAS M. ABED
ASSOCIATE DIRECTOR
NAVIGANT CONSULTING, INC.
402 WEST BROADWAY, SUITE 400
SAN DIEGO, CA 92101

LINDA WRAZEN
SEMPRA ENERGY REGULATORY AFFAIRS
101 ASH STREET, HQ16C
SAN DIEGO, CA 92101

THOMAS P. CORR
SEMPRA ENERGY GLOBAL ENTERPRISES
101 ASH STREET, HQ16C
SAN DIEGO, CA 92101

MICHAEL SHAMES
ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103

SCOTT J. ANDERS
RESEARCH/ADMINISTRATIVE DIRECTOR
UNIVERSITY OF SAN DIEGO SCHOOL OF LAW

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP31E

5998 ALCALA PARK
SAN DIEGO, CA 92110

SAN DIEGO, CA 92123

CHARLES MANZUK
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP 32D
SAN DIEGO, CA 92123

SUSAN FREEDMAN
SAN DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY, SUITE 110
SAN DIEGO, CA 92123

DESPINA NIEHAUS
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32H
SAN DIEGO, CA 92123-1530

JOHN W. LESLIE
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, SUITE 200
SAN DIEGO, CA 92130-2592

MWIRIGI IMUNGI
THE ENERGY COALITION
15615 ALTON PARKWAY, SUITE 245
IRVINE, CA 92618

CARL STEEN
BAKER & HOSTETLER LLP
600 ANTON BLVD., SUITE 900
COSTA MESA, CA 92626

JUDE LEBLANC
BAKER & HOSTETLER LLP
600 ANTON BLVD., SUITE 900
COSTA MESA, CA 92626

MICHAEL J. GILMORE
INLAND ENERGY
SOUTH TOWER SUITE 606
3501 JAMBOREE RD
NEWPORT BEACH, CA 92660

HAROLD M. ROMANOWITZ
OAK CREEK ENERGY SYSTEMS, INC.
14633 WILLOW SPRINGS ROAD
MOJAVE, CA 93501

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080

BILLY BLATTNER
SAN DIEGO GAS & ELECTRIC COMPANY
601 VAN NESS AVENUE, SUITE 2060
SAN FRANCISCO, CA 94102

DIANE I. FELLMAN
ATTORNEY AT LAW
FPL ENERGY, LLC
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

NINA SUETAKE
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., STE 350
SAN FRANCISCO, CA 94102

DAN ADLER
DIRECTOR, TECH AND POLICY DEVELOPMENT
CALIFORNIA CLEAN ENERGY FUND
5 THIRD STREET, SUITE 1125
SAN FRANCISCO, CA 94103

MICHAEL A. HYAMS
POWER ENTERPRISE-REGULATORY AFFAIRS
SAN FRANCISCO PUBLIC UTILITIES COMM
1155 MARKET ST., 4TH FLOOR
SAN FRANCISCO, CA 94103

DEVRA WANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER STREET, 20TH FLOOR
SAN FRANCISCO, CA 94104

DOUGLAS E. COVER
ENVIRONMENTAL SCIENCE ASSOCIATES
225 BUSH STREET, SUITE 1700
SAN FRANCISCO, CA 94104

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104

SEEMA SRINIVASAN
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104

SETH D. HILTON
STOEL RIVES
111 SUTTER ST., SUITE 700
SAN FRANCISCO, CA 94104

SNULLER PRICE
ENERGY AND ENVIRONMENTAL ECONOMICS
101 MONTGOMERY, SUITE 1600
SAN FRANCISCO, CA 94104

ASHLEE M. BONDS
THELEN REID BROWN RAYSMAN&STEINER LLP
SUITE 1800
101 SECOND STREET
SAN FRANCISCO, CA 94105

DEBORAH BROCKETT
CONSULTANT
NAVIGANT CONSULTING, INC.
SPEAR STREET TOWER, SUITE 1200
ONE MARKET STREET
SAN FRANCISCO, CA 94105

ED LUCHA
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B9A
SAN FRANCISCO, CA 94105

JASON YAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B13L
SAN FRANCISCO, CA 94105

JOHN PAPPAS
UTILITY ELECTRIC PORTFOLIO MANAGEMENT
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, N12E
SAN FRANCISCO, CA 94105

LENNY HOCHSCHILD
EVOLUTION MARKETS, LLC
RENEWABLE ENERGY MARKETS
425 MARKET STREET, SUITE 2200
SAN FRANCISCO, CA 94105

MADDIE REICHER
EVOLUTION MARKETS
425 MARKET STREET, SUITE 2209
SAN FRANCISCO, CA 94105

PAUL LACOURCIERE
ATTORNEY AT LAW
THELEN REID BROWN RAYSMAN & STEINER LLP

NIELS KJELLUND
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B9A

101 SECOND STREET, SUITE 1800
SAN FRANCISCO, CA 94105

SAN FRANCISCO, CA 94105-1814

JON WELNER
PAUL HASTINGS JANOFFSKY & WALKER LLP
55 SECOND STREET, 24TH FLOOR
SAN FRANCISCO, CA 94105-3441

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVENUE
SAN FRANCISCO, CA 94110

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVE.
SAN FRANCISCO, CA 94110-1431

JANINE L. SCANCARELLI
ATTORNEY AT LAW
FOLGER, LEVIN & KAHN, LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111

KARLEEN O'CONNOR
WINSTON & STRAWN LLP
101 CALIFORNIA STREET
SAN FRANCISCO, CA 94111

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

ROBERT B. GEX
ATTORNEY AT LAW,
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

STANDISH O'GRADY
FRIENDS OF KIRKWOOD ASSOCIATION
31 PARKER AVENUE
SAN FRANCISCO, CA 94118

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442

GRACE LIVINGSTON-NUNLEY
ASSISTANT PROJECT MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177

KATE BEARDSLEY
PG&E
MAILCODE B9A
PO BOX 770000
SAN FRANCISCO, CA 94177

NINA BUBNOVA
CASE MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177

STEPHANIE LA SHAWN
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, B9A
SAN FRANCISCO, CA 94177-0001

ROBIN J. WALTHER
1380 OAK CREEK DRIVE, NO. 316
PALO ALTO, CA 94304-2016

NICOLAS PROCOS
ALAMEDA POWER & TELECOM
2000 GRAND STREET
ALAMEDA, CA 94501-0263

KEITH WHITE
931 CONTRA COSTA DRIVE
EL CERRITO, CA 94530

JACK PIGOTT
GEN 3 SOLAR, INC.
31302 HUNTSWOOD AVENUE
HAYWARD, CA 94544

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT
ORINDA, CA 94563

KEVIN DUGGAN
CALPINE COPORATION
3875 HOPYARD ROAD, SUITE 345
PLEASANTON, CA 94588

ROBERT T. BOYD
GE WIND ENERGY
6130 STONERIDGE MAIL ROAD, SUITE 300B
PLEASANTON, CA 94588-3287

PETER W. HANSCHEN
ATTORNEY AT LAW
MORRISON & FOERSTER, LLP
101 YGNACIO VALLEY ROAD, SUITE 450
WALNUT CREEK, CA 94596

PATRICIA THOMPSON
SUMMIT BLUE CONSULTING
2920 CAMINO DIABLO, SUITE 210
WALNUT CREEK, CA 94597

WILLIAM F. DIETRICH
ATTORNEY AT LAW
DIETRICH LAW
2977 YGNACIO VALLEY ROAD, 613
WALNUT CREEK, CA 94598-3535

NELLIE TONG
KEMA, INC.
492 NINTH STREET, SUITE 220
OAKLAND, CA 94607

RAMONA GONZALEZ
EAST BAY MUNICIPAL UTILITY DISTRICT
375 ELEVENTH STREET, M/S NO. 205
OAKLAND, CA 94607

PAUL FENN
LOCAL POWER
4281 PIEDMONT AVE.
OAKLAND, CA 94611

MRW & ASSOCIATES, INC.
1814 FRANKLIN STREET, SUITE 720
OAKLAND, CA 94612

BARRY H. EPSTEIN
FITZGERALD, ABBOTT & BEARDSLEY, LLP
1221 BROADWAY, 21ST FLOOR

CYNTHIA WOOTEN
LUMENX CONSULTING, INC.
1126 DELAWARE STREET

OAKLAND, CA 94612

BERKELEY, CA 94702

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
BERKELEY, CA 94703-2714

ADAM BRIONES
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704

CLIFF CHEN
UNION OF CONCERNED SCIENTIST
2397 SHATTUCK AVENUE, STE 203
BERKELEY, CA 94704

JANICE LIN
MANAGING PARTNER
STRATEGEN CONSULTING LLC
146 VICENTE ROAD
BERKELEY, CA 94705

TIM MASON
1000 FRESNO AVE.
BERKELEY, CA 94707

BRENDA LEMAY
DIRECTOR OF PROJECT DEVELOPMENT
HORIZON WIND ENERGY
1600 SHATTUCK, SUITE 222
BERKELEY, CA 94709

EDWARD VINE
LAWRENCE BERKELEY NATIONAL LABORATORY
BUILDING 90-4000
BERKELEY, CA 94720

RYAN WISER
BERKELEY LAB
MS-90-4000
ONE CYCLOTRON ROAD
BERKELEY, CA 94720

BRIAN C. FRECKMANN
C/O FOUNDATION PARTNERS
100 DRAKES LANDING ROAD, NO. 125
GREENBRAE, CA 94904

DAI OWEN
607 VIA CASITAS
GREENBRAE, CA 94904

DEREK DENNISTON
THE DENNISTON GROUP, LLC
101 BELLA VISTA AVE
BELVEDERE, CA 94920

LYNN M. ALEXANDER
LMA CONSULTING
129 REDWOOD AVENUE
CORTE MADERA, CA 94925

TIM ROSENFELD
131 CAMINO ALTO, SUITE D
MILL VALLEY, CA 94941

CARL PECHMAN
POWER ECONOMICS
901 CENTER STREET
SANTA CRUZ, CA 95060

SUSAN M. O'BRIEN
MCCARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113

DAVID OLIVARES
ELECTRIC RESOURCE
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352

CHRISTOPHER J. MAYER
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352-4060

JOY A. WARREN
ATTORNEY AT LAW
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460

RICHARD MCCANN
M.CUBED
2655 PORTAGE BAY ROAD, SUITE 3
DAVIS, CA 95616

DAVID MORSE
1411 W, COVELL BLVD., SUITE 106-292
DAVIS, CA 95616-5934

LEGAL AND REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

GRANT A. ROSENBLUM
STAFF COUNSEL
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

SAEED FARROKHPAY
FEDERAL ENERGY REGULATORY COMMISSION
110 BLUE RAVINE RD., SUITE 107
FOLSOM, CA 95630

DENNIS W. DE CUIR
ATTY AT LAW
A LAW CORPORATION
2999 DOUGLAS BLVD., SUITE 325
ROSEVILLE, CA 95661

KEVIN DAVIES
SOLAR DEVELOPMENT INC.
2424 PROFESSIONAL DR.
ROSEVILLE, CA 95661-7773

DAVID OLIVER
NAVIGANT CONSULTING
3100 ZINFANDEL DRIVE, SUITE 600
RANCO CORDOVA, CA 95670

KENNY SWAIN
NAVIGANT CONSULTING
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670

ERIN RANSLOW
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600

LAURIE PARK
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600

RANCHO CORDOVA, CA 95670-6078

RANCHO CORDOVA, CA 95670-6078

KARLY MCCRORY
SOLAR DEVELOPMENT
2424 PROFESSIONAL DRIVE
ROSEVILLE, CA 95677

DOUG DAVIE
DAVIE CONSULTING, LLC
3390 BEATTY DRIVE
EL DORADO HILLS, CA 95762

JEDEDIAH J. GIBSON
ELLISON SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95811

BRUCE MCLAUGHLIN
ATTORNEY AT LAW
BRAUN & BLAISING P.C.
915 L STREET, SUITE 1420
SACRAMENTO, CA 95814

DOUGLAS K. KERNER
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814

JANE E. LUCKHARDT
ATTORNEY AT LAW
DOWNEY BRAND LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO, CA 95814

PATRICK STONER
PROGRAM DIRECTOR
LOCAL GOVERNMENT COMMISSION
1303 J STREET, SUITE 250
SACRAMENTO, CA 95814

RACHEL MCMAHON
CEERT
1100 11TH STREET, SUITE 311
SACRAMENTO, CA 95814

SCOTT BLAISING
ATTORNEY AT LAW
BRAUN & BLAISING, P.C.
915 L STREET, SUITE 1420
SACRAMENTO, CA 95814

STEVE BRINK
CALIFORNIA FORESTRY ASSOCIATION
1215 K STREET, SUITE 1830
SACRAMENTO, CA 95814

STEVEN KELLY
POLICY DIRECTOR
INDEPENDENT ENERGY PRODUCERS ASSN
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814

ROB ROTH
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET MS 75
SACRAMENTO, CA 95817

MICHAEL DEANGELIS
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET
SACRAMENTO, CA 95817-1899

VIKKI WOOD
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6301 S STREET, MS A204
SACRAMENTO, CA 95817-1899

CAROL J. HURLOCK
CALIFORNIA DEPT. OF WATER RESOURCES
JOINT OPERATIONS CENTER
3310 EL CAMINO AVE. RM 300
SACRAMENTO, CA 95821

LEE TERRY
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVENUE
SACRAMENTO, CA 95821

RICH LAUCKHART
GLOBAL ENERGY
SUITE 200
2379 GATEWAY OAKS DR.
SACRAMENTO, CA 95833

RONALD LIEBERT
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB 119
ANTELOPE, CA 95843

CATHIE ALLEN
CA STATE MGR.
PACIFICORP
825 NE MULTNOMAH STREET, SUITE 2000
PORTLAND, OR 97232

KYLE DAVIS
PACIFICORP
825 NE MULNOMAH, SUITE 2000
PORTLAND, OR 97232

DONALD SCHOENBECK
RCS, INC.
900 WASHINGTON STREET, SUITE 780
VANCOUVER, WA 98660

TIMOTHY CASTILLE
LANDS ENERGY CONSULTING, INC.
18109 SE 42ND STREET
VANCOUVER, WA 98683

MONIQUE STEVENSON
SEA BREEZE PACIFIC REGIONAL TRANSMISSION
LOBBY BOX 91
333 SEYMOUR ST., SUITE 1400
VANCOUVER, BC V5B 5A6
CANADA

State Service

AMANDA C. BAKER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANDREW SCHWARTZ
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5217
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANNE E. SIMON
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5024
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANNE GILLETTE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BRIAN D. SCHUMACHER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BURTON MATTSON
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHRISTOPHER DANFORTH
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DONALD R. SMITH
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DOROTHY DUDA
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5109
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ELLEN S. LEVINE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5028
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

F. JACKSON STODDARD
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5125
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JACLYN MARKS
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5306
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JANE WHANG
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5029
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JAY MORSE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE A. FITCH
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE HALLIGAN
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARK R. LOY
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MATTHEW DEAL
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5215
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MERIDETH STERKEL
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION

NANCY RYAN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION

AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROOM 5217
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NILGUN ATAMTURK
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5303
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NOEL OBIORA
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAUL DOUGLAS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARA M. KAMINS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SEAN A. SIMON
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TRACI BONE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5206
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SUZANNE KOROSEK
CALIFORNIA ENERGY COMMISSION
MS-31
1516 9TH STREET
SACRAMENTO, CA 95184

JAMES MCMAHON
SENIOR ENGAGEMENT MANAGER
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

CLARE LAUFENBERG GALLARDO
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-46
SACRAMENTO, CA 95814

CLARE LAUFENBERG
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 46
SACRAMENTO, CA 95814

CONSTANCE LENI
CALIFORNIA ENERGY COMMISSION
MS-20
1516 NINTH STREET
SACRAMENTO, CA 95814

HEATHER RAITT
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 45
SACRAMENTO, CA 95814

KATE ZOCCHETTI
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-45
SACRAMENTO, CA 95814

MARC PRYOR
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS 20
SACRAMENTO, CA 95814

ROSS MILLER
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO, CA 95814

THOMAS FLYNN
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

BILL KNOX
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 45
SACRAMENTO, CA 95814-5504

HOLLY B. CRONIN
STATE WATER PROJECT OPERATIONS DIV
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE., LL-90
SACRAMENTO, CA 95821

[Top of Page](#)

[Back to INDEX OF SERVICE LISTS](#)